

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>CITY OF CHICAGO, an Illinois municipal corporation,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>GLOCK, INC.,</b>  <b>Defendant.</b>	<b>Case No. 24 cv 03088</b>  <b>Hon. Steven C. Seeger</b>
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**AGREED FIRST MOTION FOR EXTENSION OF TIME  
FOR DEFENDANT GLOCK, INC. TO RESPOND TO COMPLAINT  
AND PROPOSED JOINT BRIEFING SCHEDULE**

Defendant Glock, Inc. (“Glock”), by its undersigned counsel, hereby moves pursuant to Federal Rule of Civil Procedure 6 for an extension of time to move, answer or otherwise respond to Plaintiff’s Complaint (“Complaint”). Plaintiff City of Chicago (the “City”) has agreed to Glock’s request for an extension up to and including June 10, 2024. In light of the issues raised by the Complaint and with the expectation that Glock’s response will include a responsive motion, Glock and the City have also agreed on a proposed briefing schedule for such a motion, as set forth below. In support thereof, Glock and the City state as follows:

1. On April 17, 2024, Glock removed the current action from Cook County Chancery Court to this Court. [Doc. 1, Notice of Removal.]
2. Pursuant to Federal Rule of Civil Procedure Rule 81(c)(2)(C), Glock’s response to the Complaint following removal would be due on April 24, 2024.

3. Defendant hereby moves for an extension up to and including June 10, 2024, to move, answer or otherwise respond to the Complaint. This request is to permit adequate time to prepare Glock's response and is not requested merely for delay.

4. This is Glock's first request for an extension of the time to respond to the Complaint. On April 19, 2024, counsel for Glock spoke with Chelsey Metcalf and Rebecca Hirsch, counsel for the City, regarding Glock's request for an extension and a proposed briefing schedule related to the anticipated motion responding to the Complaint.

5. After further consultation, the City agreed to Glock's request for an extension, and the parties agreed to propose the following schedule to the Court:

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|----|----------------------------------|-----------------|
| a. | Glock Response to the Complaint  | June 10, 2024   |
| b. | City Response to Glock's Motion  | July 25, 2024   |
| c. | Glock Reply in Support of Motion | August 26, 2024 |

WHEREFORE, Glock respectfully requests that the Court grant its agreed first motion and extend the time to move, answer or otherwise respond to the Complaint up to and including June 10, 2024. Glock and the City further request that the Court accept their proposed briefing schedule on any motion brought by Glock in response to the Complaint.

Dated: April 23, 2024

Respectfully submitted,

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